

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DATE FILED:	APR 24 2019
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ELECTRONICALLY FILED	
DOCUMENT	
USDC SDNY	

UNITED STATES OF AMERICA

- v. -

ADAM TORO,  
a/k/a "Laflair,"  
a/k/a "Spoz,"

Defendant.

SEALED INDICTMENT

19 Cr.

**19 CRIM 299**

COUNT ONE

(Conspiracy to Commit Bank Fraud)

The Grand Jury charges:

1. From at least in or about April 2018 up to and including in or about November 2018, in the Southern District of New York and elsewhere, ADAM TORO, a/k/a "Laflair," a/k/a "Spoz," the defendant, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

2. It was a part and object of the conspiracy that ADAM TORO, a/k/a "Laflair," a/k/a "Spoz," the defendant, and others known and unknown, would and did execute and attempt to execute a scheme and artifice to defraud such financial institutions,

**JUDGE TORRES**

the deposits of which were then insured by the Federal Deposit Insurance Corporation ("FDIC"), and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

**COUNT TWO**  
(Bank Fraud)

The Grand Jury further charges:

3. From at least in or about April 2018 up to and including in or about November 2018, in the Southern District of New York and elsewhere, ADAM TORO, a/k/a "Laflair," a/k/a "Spoz," the defendant, willfully and knowingly, did execute and attempt to execute a scheme and artifice to defraud such financial institutions, the deposits of which were then insured by the FDIC, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of false and fraudulent pretenses, representations, and promises, to wit, TORO deposited and aided and abetted the deposit of stolen,

forged, and/or altered checks in an attempt to withdraw said fraudulent funds.

(Title 18, United States Code, Sections 1344, and 2.)

**FORFEITURE ALLEGATION**

4. As the result of committing the offenses alleged in Counts One and Two of this Indictment, ADAM TORO, a/k/a "Laflair," a/k/a "Spoz," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting or derived from, proceeds obtained directly or indirectly, as a result of the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

**Substitute Assets Provision**

5. If any of the forfeitable property described above in paragraph four of this Indictment, as a result of any act or omission of ADAM TORO, a/k/a "Laflair," a/k/a "Spoz," the defendant,

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982,  
Title 21, United States Code, Section 853, and  
Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
GEOFFREY S. BERMAN  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES OF AMERICA

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a/k/a "Laflair,"  
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Defendant.

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INDICTMENT

19 Cr.

(Title 18, United States Code,  
Sections 1344, 1349, and 2)

GEOFFREY S. BERMAN  
United States Attorney

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*Anthony Ramo IV*  
Foreperson

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4/24/19 - Filed Sealed Indictment.  
AC A/W issued.

*MJ Pitman*  
U.S.M.J.